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### Attorneys for Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DIAMOND RESORTS CORPORATION, a Maryland corporation; DIAMOND RESORTS HOLDINGS, LLC, a Nevada limited liability company; and DIAMOND RESORTS INTERNATIONAL, INC, a Delaware corporation, ) Case No.: 2:19-cv-00227-GMN-NJK  
Plaintiffs, ) ) **STIPULATION AND ORDER TO EXTEND TIME TO FILE REPONSE TO COMPLAINT [ECF NO. 1]**  
vs. ) ) **FIRST REQUEST**  
KYLE BROWN, an individual; MARTIN BROWN, )  
an individual; EXCHANGE POINTS CLUB, LLC, a )  
Florida and Missouri limited liability company; )  
PREMIER REWARDS LLC, a Missouri limited )  
liability company; VMG RESORTS LLC, a Missouri )  
limited liability company; VACATION )  
MANAGEMENT GROUP, LLC, a Missouri limited )  
liability company; and OWNER EXTRAS, LLC, a )  
Missouri limited liability company, )  
Defendants. )

Pursuant to Local Rules 6-1 and 7-1, Plaintiffs DIAMOND RESORTS CORPORATION, DIAMOND RESORTS HOLDINGS, LLC, and DIAMOND RESORTS INTERNATIONAL, INC., (“Plaintiffs”), and Defendants, KYLE BROWN, MARTIN BROWN, EXCHANGE

1 POINTS CLUB, LLC, PREMIER REWARDS LLC, VMG RESORTS LLC, VACATION  
2 MANAGEMENT GROUP, LLC, and OWNER EXTRAS, LLC (“Defendants”), by and through  
3 their respective attorneys of record, stipulate as follows:

4 **STIPULATION**

5 1. Plaintiffs filed their Complaint on February 6, 2019 [ECF No. 1] alleging causes  
6 of action for violations of the Lanham Act, among other claims.

7 2. Some of the Defendants were served on February 7, 2019, and the remaining  
8 Defendants were served thereafter.

9 3. The current deadline for the Defendants to respond to the Complaint is February  
10 28, 2019.

11 4. Defendants initially retained a law firm in Las Vegas to represent them in this  
12 matter. However, that law firm subsequently advised Defendants that it had a conflict and could  
13 not represent Defendants in this case.

14 5. In the afternoon of February 18, 2019, Defendants were able to regain Gordon  
15 Rees Scully Mansukhani to represent them in this lawsuit.

16 6. However, due to the short time period, Defendants’ attorneys have not had a  
17 chance to obtain documents or discuss in detail with the Defendants the allegations of the  
18 Complaint.

19 7. Defendants request an extension to allow them to fully review and respond to the  
20 allegations in the Complaint.

21 8. Defendants request an extension until March 21, 2019 to file their response to the  
22 Complaint.

23 9. The parties have conferred and have agreed to the requested extension and  
24 schedule described above.

25 10. The parties also agree that the Defendants are not waiving their right to seek  
26 additional time by means of a motion to this Court should they feel it is necessary.

27 11. This stipulation is not made for purposes of delay.

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1           12. Therefore, the parties agree that Defendants' response to the Complaint is now  
2 due on or before March 21, 2019.

3  
4 DATED: February 22, 2019.

5 GORDON REES SCULLY  
6 MANSUKHANI, LLP

7 /s/ *Robert S. Larsen*

8 ROBERT S. LARSEN, ESQ.  
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10 300 South 4<sup>th</sup> Street, Suite 1550  
11 Las Vegas, Nevada 89101

12 *Attorneys for Defendants*

13 DATED: February 22, 2019.

14 BALLARD SPAHR LLP

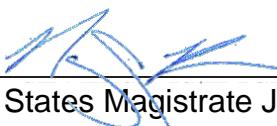
15 /s/ *Abra E. Vigil*

16 ABRAN E. VIGIL, ESQ.  
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19 Las Vegas, Nevada 89135

20 *Attorneys for Plaintiffs*

21 **ORDER**

22 IT IS SO ORDERED.

23   
24 United States Magistrate Judge  
25 DATED: February 25, 2019